

February 29, 2016

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Office of Enforcement and Compliance Assurance Office of Federal Activities International Compliance Assurance Division (2254A) Environmental Protection Agency 1200 Pennsylvania Avenue, NW Washington, DC 20460

VIA CERTIFIED MAIL - 7012 0470 0000 3701 5397

Indiana Department of Environmental Management Office of Solid and Hazardous Waste Management 100 North Senate Avenue Mail Code 61-53 IGCN 1003 Indianapolis, IN 46206

> RE: 2015 Annual Hazardous Waste Export Report Heritage Environmental Services, LLC IND 093219012

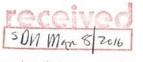
To Whom It May Concern:

The purpose of this letter is to provide the 2015 Annual Hazardous Waste Export Report for Heritage Environmental Services, LLC (Heritage). This report addresses hazardous waste shipments performed outside of the United States for calendar year 2015. The following information is provided in accordance with 40 CFR 262.56:

Exporter

Heritage Environmental Services, LLC 7901 West Morris Street Indianapolis, IN 46231 IND093219012

2. Calendar Year: 2015



3a. <u>Consignee</u>

Stablex Canada, Inc. 760 Boul. Industriel Blainville, Quebec J7C 3V4 Canada

4a. i. <u>Waste Description:</u>

RQ, UN1463, Waste Chromium Trioxide, Anhydrous, 5.1(6.1, 8), PGII

EPA Hazardous Waste Numbers:

D001, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 1,190 pounds.

ii. <u>Waste Description:</u>

RQ, UN1479, Waste Oxidizing Solid, N.O.S, 5.1, PGII, (OBA Canisters, Manganese Nitrate, Potassium Persulfate, Sodium Nitrate, Sodium Nitrate, Calcium Hypochlorite, Potassium Nitrate, Cobalt Nitrate, Sodium Persulfate, Calcium Nitrate, Sodium Chlorate, Sodium Chlorite, Cupric Nitrate, Ferric Nitrate, Sodium Perborate, Trichloroisocyanuric Acid)

EPA Hazardous Waste Numbers:

D001, D003, D005, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped twelve (12) shipments with a total quantity of 15,629 pounds.

iii. Waste Description:

RQ, UN1755, Waste Chromic Acid solution, 8, PGII

EPA Hazardous Waste Numbers:

D002, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 3,609 pounds.

iv. Waste Description:

RQ, UN2922, Waste Corrosive Liquids, Toxic, N.O.S., 8(6.1), PGII, (Sulfuric Acid, Phosphoric Acid, Nitric Acid, Hydrofluoric Acid)

EPA Hazardous Waste Numbers:

D002, D007, D008, F006, U134

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped four (4) shipments with a total quantity of 3,166 pounds.

v. <u>Waste Description:</u>

RQ, UN2923, Waste Corrosive Solids, Toxic, N.O.S., 8(6.1) PGII, (Sulfuric Acid)

EPA Hazardous Waste Numbers:

F006, D002, D008

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 249 pounds

vi. <u>Waste Description:</u>

RQ, UN3077, Waste Environmentally Hazardous Substances, Solid, N.O.S., 9, PGIII, (Neutral Solid, Alkaline Chrome Solid, Chromium, Tin, Lead, Sulfides, THH, MAH)

EPA Hazardous Waste Numbers:

D002, D005, D006, D007, D008, D010, D018, F006, K171

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped fourteen (14) shipments with a total quantity of 215,906 pounds

vii. Waste Description:

RQ, UN3082, Waste Environmentally Hazardous Substances, Liquid, N.O.S., 9, PGIII, (Chromium)

EPA Hazardous Waste Numbers:

D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Heritage shipped one (1) shipment with a total quantity of 2,375 pounds.

viii. Waste Description:

RQ, UN3084, Waste Corrosive Solids, Oxidizing, N.O.S., 8(5.1), PGII, (Sodium Hydroxide, Sodium Nitrite, Sodium Nitrate)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped two (2) shipments with a total quantity of 2,333 pounds.

ix. Waste Description:

RQ, UN3084, Waste Corrosive Solids, Oxidizing, N.O.S., 8(5.1), PGII, (Nitric Acid, Hydrofluoric Acid)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 263 pounds.

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x. <u>Waste Description:</u>

RQ, UN3085, Waste Oxidizing Solid, Corrosive, N.O.S., 5.1(8), PGII, (Sodium Chlorate, Sodium Chlorite, Potassium Peroxymonosulfate, Sodium Hydroxide, Sodium Nitrite, Sodium Nitrate, Potassium Chlorate)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped five (5) shipments with a total quantity of 2,536 pounds.

xi. Waste Description:

RQ, UN3085, Waste Oxidizing Solid, Corrosive, N.O.S., 5.1(8), PGII, (Periodic Acid)

EPA Hazardous Waste Numbers:

D001

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 37 pounds.

xii. Waste Description:

RQ, UN3087, Waste Oxidizing Solid, Toxic, N.O.S., 5.1,(6.1), PGII, (Strontium Nitrate)

EPA Hazardous Waste Numbers:

D001

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Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 100 pounds.

xiii. Waste Description:

RQ, UN3093, Waste Corrosive Liquids, Oxidizing, N.O.S., 8(5.1), PGII, (Sulfuric Acid, Hexafluorozirconic Acid, Sodium Nitrate)

EPA Hazardous Waste Numbers:

D001, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 1,493 pounds.

xiv. Waste Description:

RQ, UN3098, Waste Oxidizing Liquid, Corrosive, N.O.S., 5.1(8), PGII, (Chromic Acid, Sodium Nitrate, Chromates)

EPA Hazardous Waste Numbers:

D001, D002, D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Heritage shipped two (2) shipments with a total quantity of 476 pounds.

xv. Waste Description:

RQ, UN3099, Waste Oxidizing Liquid, Toxic, N.O.S., 5.1(6.1), PGII, (Ammonium Nitrate)

EPA Hazardous Waste Numbers:

D001

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 351 pounds.

xvi. Waste Description:

RQ, UN3139, Waste Oxidizing Liquid, N.O.S., 5.1, PGII, (Ferric Nitrate)

EPA Hazardous Waste Numbers:

D001

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 198 pounds.

xvii. Waste Description:

RQ, UN3260, Waste Corrosive Solid, Acidic, Inorganic, N.O.S., 8, PGII, (Hydrofluoric Acid, Sulfuric Acid, Nitric Acid, Hydrochloric Acid, Phosphoric Acid, Chromic Acid)



EPA Hazardous Waste Numbers:

K062, F006, D001, D002, D006, D007, D008

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped thirteen (13) shipments with a total quantity of 33,495 pounds.

xviii. Waste Description:

RQ, UN3262, Waste Corrosive Solids, Basic, Inorganic, N.O.S., 8, PGII, (Sodium Hydroxide)

EPA Hazardous Waste Numbers:

D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped three (3) shipments with a total quantity of 2,217 pounds.

xix. Waste Description:

RQ, UN3264, Waste Corrosive Liquids, Acidic, Inorganic, N.O.S., 8, PGII, (Hydrochloric Acid, Sulfuric Acid, Chromic Acid, Phosphoric Acid, Nitric Acid, Hydrofluoric Acid)

EPA Hazardous Waste Numbers:

K062, F006, F009, U134, D001, D002, D004, D006, D007, D008, D011

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped sixteen (16) shipments with a total quantity of 93,496 pounds.

xx. Waste Description:

RQ, UN3266, Waste Corrosive Liquid, Basic, Inorganic, N.O.S., 8, PGII, (Sodium Hydroxide, Sodium Silicate, Sodium Hypochlorite)

EPA Hazardous Waste Numbers:

D002, D007, D008

<u>Transporter Information:</u>

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped five (5) shipments with a total quantity of 8,727 pounds.

xxi. Waste Description:

RQ, UN3288, Waste Toxic Solid, Inorganic, N.O.S., 6.1, PGII, (Alkaline Chrome Solid)

EPA Hazardous Waste Numbers:

D007

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Heritage shipped one (1) shipment with a total quantity of 1,143 pounds.

xxii. Waste Description:

RQ, UN3290, Waste Toxic Solid, Corrosive, N.O.S., 6.1(8), PGII, (Sodium Cyanide, Sodium Hydroxide)

EPA Hazardous Waste Numbers:

F008, D002

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 22,581 pounds.

3b. <u>Consignee</u>

CRI Environment, Inc. 75, Rue Du Progres Coteau-Du-Lac, Quebec JOP 1B0 Canada

4b. i. Waste Description:

RQ, UN1954, Waste Compressed Gas, Flammable, N.O.S., 2.1, (MAPP Gas)

EPA Hazardous Waste Numbers:

D001

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Heritage shipped one (1) shipment with a total quantity of 356 pounds.

ii. Waste Description:

UN1978, Waste Propane, 2.1,

EPA Hazardous Waste Numbers:

D001

Transporter Information:

Hazmat Environmental Group, Inc. 60 Commerce Drive Buffalo, NY 14218 USA NYD980769947

Number/Amount of Shipments:

Heritage shipped two (2) shipments with a total quantity of 6,377 pounds.

5. Waste Minimization

Heritage actively promotes waste minimization. A description of our waste minimization activities is attached for reference.

In addition to the above listed waste that was generated and exported by Heritage, the below waste was generated by Heritage but a primary exporter was used on behalf of Heritage:

1a. Exporter

ENPRO Services of Vermont, Inc. 54 Avenue D Williston, VT 05495 VTR000517052

Generator

Heritage Environmental Services, LLC 7901 West Morris Street Indianapolis, IN 46231 IND093219012

2a. Calendar Year: 2015

3a. Consignee

Stablex Canada, Inc. 760 Boul. Industriel Blainville, Quebec J7C 3V4 Canada

4a. <u>Waste Description:</u>

RQ, UN3288, Waste Toxic Solid, Inorganic, N.O.S., 6.1, PGIII, (Lead, Cyanide)

EPA Hazardous Waste Numbers:

D003, D008

Transporter Information:

Transport Rollex 910 Lionel Boulet Varrennes, Quebec J3V 1S5 Canada NYF006000053

Number/Amount of Shipments:

Heritage shipped one (1) shipment with a total quantity of 60,000 pounds.

1b. <u>Exporter</u>

Clean Harbors Environmental Services, Inc. 4475 South Dort Highway Burton, MI 48529 MIR000014530

Generator

Heritage Environmental Services, LLC 7901 West Morris Street Indianapolis, IN 46231 IND093219012

2b. Calendar Year: 2015

3b. <u>Consignee</u>

Clean Harbors Canada, Inc. 4090 Telfer RD, R.R. #1 Corunna, ON NON 1G0 Canada

4b. Waste Description:

RQ, UN3077, Hazardous Waste, Solid, N.O.S., 9, PGIII, (F037)

EPA Hazardous Waste Numbers:

F037

Transporter Information:

Heritage Transport, LLC 1626 Research Way Indianapolis, IN 46231 USA IND058484114

Clean Harbors Environmental Services, Inc. 42 Longwater Drive Norwell, MA 02061 USA MAD039322250

Number/Amount of Shipments:

Heritage shipped eight (8) shipments with a total quantity of 348,084 pounds.

5. Waste Minimization

Heritage actively promotes waste minimization. A description of our waste minimization activities is attached for reference.

If there are any question or comments regarding this information, please contact me at 317/486-2727.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Sincerely,

HERITAGE ENVIRONMENTAL SERVICES, LLC.

Christopher Ray Compliance Manager

Corporate Compliance

cc:



MEMORANDUM

TO:

RCRA Part B Federal File

Operating Record

FROM:

Christopher Ray

DATE:

February 29, 2016

RE:

Waste Minimization Certification

The purpose of this memorandum is to provide the annual waste minimization certification in accordance with Heritage's Part B federal permit, condition I.G.

Heritage Environmental Services, LLC (Heritage) has a program in place to reduce the volume and toxicity of generated hazardous wastes to the degree determined to be economically practicable. Also, the practicable methods of storage and treatment currently available to Heritage are those practicable methods that minimize, to the extent possible, the present and future threat to human health and the environment.

In 2015, Heritage performed the following specific waste minimization efforts at the Indianapolis Treatment Center:

- 1. Operates a patented cyanide destruction process that does not rely on toxic reagents such as chlorine gas for waste treatment.
- Operates high-pressure filter presses to reduce the volume of filtercake requiring subsequent stabilization and disposal.
- 3. Assorted universal waste batteries, such as mercury, nickel cadmium, nickel metal hydride and lithium, were sent for reclamation.
- 4. Performed drum reclamation and recycling activities. Containers were recycled as scrap metal, sent to drum reclaimer, or re-certified for reuse.
- Sent Fluorescent lamps and tubes to recycling facilities for mercury recovery.
- 6. Recycled used cardboard, office paper, pallets, miscellaneous scrap metal parts.
- 7. Conducts and implements ongoing spill prevention, preventative maintenance, inspection and housekeeping programs to minimize environmental releases.

Memo re: Waste Minimization Certification

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In summary, Heritage continues to promote an aggressive, ongoing commitment to waste minimization. Pollution prevention and waste minimization enjoy support from senior management as being essential to our long-term interests.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certification Period: January 2015- January 2016

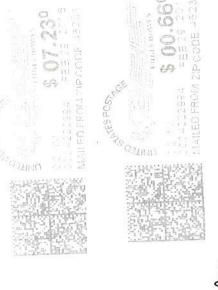
Christopher Ray

Plant Compliance Manager

cc: Corporate Compliance

Heritage Environmental Services, LLC 7901 West Morris Street Indianapolis, IN 46231 Attn: Christopher Ray





Division (2254A) Office of Enforcement & Compliance Assi Office of Foderal Activities International Compliance Assurance 1200 Pennsolvania Avenue, NW Enview monty 1 protoction Agency washington, DC 20460

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